

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

JACKSON WOMEN’S HEALTH  
ORGANIZATION, on behalf of itself and  
its patients,

and

SACHEEN CARR-ELLIS, M.D., M.P.H.,  
on behalf of herself and her patients,

Plaintiffs,

v.

THOMAS E. DOBBS, M.D., M.P.H., in his  
official capacity as State Health Officer of the  
Mississippi Department of Health, et al.,

Defendants.

Case No. 3:18-cv-00171-CWR-FKB

**UNOPPOSED MOTION TO AMEND CASE MANAGEMENT ORDER**

Plaintiffs Jackson Women’s Health Organization and Sacheen Carr-Ellis, M.D., M.P.H. (“Plaintiffs”) submit this Motion to Amend the Case Management Order (ECF No. 91), as amended on October 21, 2019, in accordance with the stipulated schedule set forth herein. In support of their motion, Plaintiffs state the following:

1. The Parties have conferred among themselves on the relief sought in this motion, specifically, the schedule for expert disclosures with respect to one of Plaintiffs’ experts. Defendants Thomas E. Dobbs, MD, MPH, Kenneth Cleveland, MD, Gerald A. Mumford, and Robert Shuler Smith do not oppose;<sup>1</sup>

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<sup>1</sup> Defendant Wendy Wilson-White did not respond to Plaintiffs’ email regarding this motion, which Plaintiffs interpret to mean she takes no position.

2. Due to extenuating personal circumstances, Plaintiffs seek to extend the deadline for expert disclosure under Fed. R. Civ. P. 26(a)(2) with respect to Plaintiffs' socioeconomic expert, but note that Plaintiff's proposal does not affect the deadlines set for all other expert disclosures set forth in Item 7.E of the Case Management Order, nor does it affect the deadline for all discovery set forth in Item 7.C of the Case Management Order; and

3. For this reason, good cause exists under Fed. R. Civ. P. 16(b)(4) to amend the deadline for Plaintiffs' expert disclosure in the Case Management Order for one of Plaintiffs' experts.

### **RELIEF REQUESTED**

Plaintiffs respectfully request that the Court modify the Case Management Order as follows:

1. Change the date in Item 7.E.1 of the Case Management Order by which Plaintiffs' socioeconomic expert must be designated from January 15, 2020 to January 29, 2020.

Simultaneous with the filing of this Motion, Plaintiffs are submitting a proposed order to Magistrate Judge Ball's chambers in accordance with the Administrative Procedures for ECF Filing.

Dated: January 10, 2020

/s/ Aaron Delaney

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 10, 2020, I electronically filed the foregoing Joint Motion to Amend Case Management Order with the Clerk of the Court by using the Court's CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Aaron Delaney

Aaron Delaney, NY Bar #4321642

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